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February 18, 2021

Via ECF
Honorable John K. Sherwood, U.S.B.J.
United States Bankruptcy Court
Dr. Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey

**RE: 19-27627-JKS
JUAN CARLOS JIMENEZ
Objection to Mr. Cooper's Certification of Default**

Dear Judge Sherwood:

Please accept this letter as an objection to the Certification of Default filed by Mr. Cooper. I have been unable to communicate with the debtor, in order to prepare opposition, since the filing of the Certification of Default. This debtor routinely travels out of the country for several weeks at a time.

This debtor has several income sources that would likely allow for the arrears alleged in the certification, if they exist, to be cured. Additionally, according to the creditor's filing, the debtor tendered payments as recently as 2.5 weeks prior to the filing of the Certification of Default. This is not a case of an total failure to make any payments, but an allegation that regular payments have been insufficient.

Lastly, the subject property, located at 53 Cottage Street, Jersey City, New Jersey has a current Zillow property value of \$722,000.00. Mr. Cooper's claim in 2019 was \$351,707.44, which leaves Mr. Cooper with sufficient adequate protection to, at minimum, schedule a hearing in this matter prior to entering an order granting stay relief.

For the aforementioned reasons, I respectfully request that a hearing be schedule in this matter.

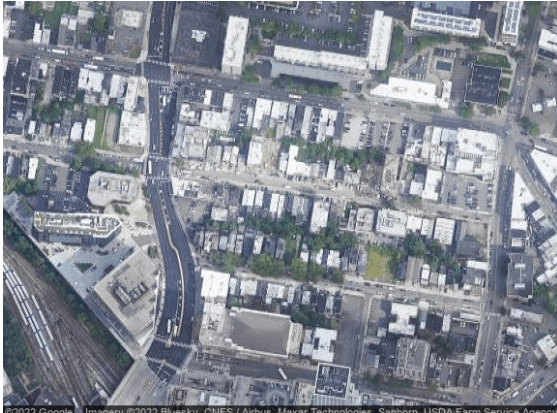
Respectfully,

Avram White, Esq.



Sign in

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-- bd | -- ba | 1,926 sqft

53 Cottage St, Jersey City, NJ 07306

Off market | Zestimate®:

\$722,600 | Rent Zestimate®:

\$2,272

Est. refi payment: \$4,221/mo

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